REMARKS

Claims 1-22 and **34-37** are pending in the application.

Claims 1-22 and **34-37** have been rejected.

Claim 37 has been **amended**. No new matter is added herein.

No claims have been **cancelled** or **added** herein.

Rejection of Claims under 35 U.S.C. § 103

Claims 1-4, 12-15, and 33-37

Claims 1-4, 12-15, and 33-37 are rejected under U.S.C. § 103(a) as being unpatentable over Coleman, U.S. Patent No. 5,708,828 (Coleman) in view of Balgeman, U.S. Patent No. 5,446,880 (Balgeman) and further in view of King, U.S. Patent Publication No. 2003/0110104 (King). Applicants respectfully traverse this rejection.

Applicants respectfully submit that Coleman, Balgeman, and King, alone or in any rational combination, fail to teach or suggest all the elements of independent claim 1, as amended, including:

> "...
> generating an inventory balance delta, wherein
> the inventory balance delta is calculated as a difference between a source inventory balance and a target inventory balance,
> the source inventory balance information in the intermediate format comprises the source inventory balance,
> the target inventory balance information in the intermediate format comprises the target inventory balance, and
> the generating is performed by the integration server, and
> ..."

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman,* Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54. However, insofar as Applicants are able to discern, Coleman does not teach or suggest generating an inventory balance delta (i.e., the difference between a source inventory balance and a target inventory balance). Further, the Office Action (correctly) fails to cite any passages of Coleman against any elements of claim 1 related to generating an inventory balance

delta. Applicants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 1, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Applicants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to the claimed generating of an inventory balance delta. Further, the Office Action (correctly) also does not cite Balgeman for any elements of claim 1 related to generating an inventory balance delta. Applicants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

King also fails to remedy these deficiencies. King, in general terms, relates to an inventory management system associated with providing components and materials to customers. *King*, Abstract. King discusses monitoring and managing value-added services, (e.g., assembly and aggregating services that can be performed on components), and disseminating information directed to inventory management. *Id.* King also discusses sharing information related to customer demands, inventory levels, advance shipping notices, work in process, delivery, and replenishment. *Id.*

On page 5, the Office Action cites various portions of King, but fails to particularly point out what elements of King might somehow be mapped to the elements of claim 1 related to generating an inventory balance delta. Applicants, as an initial matter, assume that this is the case because, in fact, no such parallel can be successfully drawn. The cited paragraph [0040] of King relates to FIG. 3 that discusses elements that are generated, received and/or transmitted by and between parties of FIG. 3. The cited paragraph [0043] of King relates to FIG. 5 that shows elements that are created, received and/or transmitted by a supply chain server, logistics provider, and supplier. The cited paragraph [0080] of King relates to calculation of a demand plan. Applicants respectfully submit King does not teach or suggest, and the Office Action does not provide proper mappings or citations for, any of the above recited elements of claim 1.

For example, if one were to attempt to map the element of inventory balance of King to the inventory balance delta of claim 1, such a mapping would fail for at least the following reasons. Inventory balance (element 28 of FIG. 4) refers to the VMI inventory balance. *See, e.g., King,* [0059]. The VMI inventory balance references VMI inventory (Vendor Managed Inventory) of a VMI hub, such as hub (element 11). See, e.g., *King*, [0032]. Each such VMI hub stores Vendor Managed Inventory (element 12) received from company warehouses. *King*, [0032]. Applicants respectfully submit that, since the Office Action merely cites whole paragraphs of King, it is not clear from the Office Action what feature of King might be (or could possibly be) successfully mapped to the element of source inventory balance or target inventory balance. Furthermore, it is also clear that the VMI inventory balance of King cannot be mapped to an inventory balance delta, at least for the simple reason that the VMI inventory merely corresponds to some inventory at a VMI hub, and is not calculated, and certainly not calculated as a claimed difference between a source inventory balance and a target inventory balance. *King*, [0032].

Alternatively, if one were to attempt to map the element of replenishment demand plan of King to the inventory balance delta of claim 1, such a mapping would fail for at least the following reasons. The replenishment demand plan (element 32 of FIG. 4) is used when generating replenishment orders that are transmitted to a supplier. *King*, [0049]. For example, a supplier can use the replenishment plan to fulfill customer demands, refill VMI inventory levels, or generate shipping notice information. *Id.* In other words, the replenishment demand plan is used for replenishment of VMI inventory (element 12), such as by estimating an amount of inventory that will be placed in a VMI hub after customer's forecasted demand (element 24) is met. *King,* [0056]. Applicants respectfully submit that it is clear the replenishment demand plan of King cannot be mapped to an inventory balance delta, at least for the simple reason that the replenishment demand plan is reflective of customer demands, and is not calculated in any manner, much less as the claimed difference between a source inventory balance and a target inventory balance.

Further still, if one were to attempt to map the element of demand plan of King to the inventory balance delta of claim 1, such a mapping would fail for at least the following reasons. The demand plan (element 26 of FIG.4) is generated from forecasted demands and the inventory data, such as on-hand, WIP, and in transit inventory. Applicants respectfully submit that it is clear that the demand plan of King cannot be mapped to an inventory balance delta, at least for

the simple reason that the demand plan is determined using received forecasted demands from customers, and is not calculated as a claimed difference between a source inventory balance and a target inventory balance. King, [0043].

These shortcoming of King are expected, since King is concerned with creating and fulfilling demand plans to replenish inventory based on customer demands, forecasted customer demands, and/or value added services. King does not teach or suggest generating an inventory balance delta, where the inventory balance delta is calculated as a difference between a source inventory balance and a target inventory balance. Thus, King, taken alone or in any rational combination with Balgeman and Coleman (which also fail to teach these features, as noted earlier), also fails to show, teach, or suggest at least these features of claim 1, among others.

In summary, since the combination of Coleman, Balgeman, and King does not teach or suggest each and every feature of claim 1, the combination of Coleman, Balgeman, and King cannot render claim 1 obvious. Furthermore, independent claim 12 is patentable over Coleman, Balgeman, and King for similar reasons to independent claim 1, and further in view of its own features. Claims 3-4 and 34-37, which depends from independent claim 1, and claims 13-15, which depend from independent claim 12, are patentable over Coleman, Balgeman, and King for at least the reasons provided for their respective base independent claims, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 1-4, 12-15, and 34-37 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

Claims 5-11 and 16-22

Claims 5-11 and 16-22 are rejected under U.S.C. § 103(a) as being unpatentable over Coleman in view of Balgeman, King, and further in view of Katz, U.S. Patent Publication No. 2002-0178077 (Katz). Applicants respectfully traverse this rejection.

As described above, independent claims 1 and 12 are patentable over Coleman, Balgeman, and King. Upon review of Katz, Applicants can discern no showing, teaching, or even suggestion that Katz in any way remedies the deficiencies of Coleman, Balgeman, and King, and therefore claims 1 and 12 are also patentable over Coleman, Balgeman, King, and Katz, alone or in combination. Applicants further assert that claims 5-11, which depend from claim 1, and claims 16-22, which depend from claim 12, are also patentable over Coleman, Balgeman, King, and Katz for at least the reasons provided for their respective base claims, and

further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 5-11 and 16-22 be reconsidered and withdrawn.

CONCLUSION

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

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